

REMARKS

This Amendment and Response is in response to the outstanding Office Action.

1. Drawings

The Examiner objects to Fig. 2 because, allegedly, one skilled in the art would not understand why the Applicant would want to compress a compressed tile in steps 207-208. However, it is clear in the portions of the specification that refer to those steps that at step 207, the tile being processed at that point is in a decompressed state, having been used for display or modification. In this regard, step 207 is not a test to check whether the tile is currently compressed, but the test determines whether the TFT entry for the tile indicates that the tile had previously been compressed before decompression and use. During write-back of the tile, if the TFT entry so indicates that the tile should be re-compressed, then compression is performed at step 208.

Accordingly, the Applicant has amended the text of step 207 to more clearly explain the step. Support for this amendment is found in the specification, at least on page 9, lines 4-13, and thus, no new matter has been added. A corrected drawing sheet containing the amended version of Fig. 2 in compliance with 37 C.F.R. § 1.121(d) is submitted herewith.

2. Present Status Of The Claims

The Office Action rejects all of pending claims 1-11 and 13-15. Claims 1, 5 and 14-15 are rejected under 35 U.S.C. § 112, 1st paragraph, and claims 1-8 and 14-15 are rejected under 35 U.S.C. § 103. Further, the Office Action contains an Objection to claims 1 and 5 that is separate from the Rejection of those claims, but for the same reason that they are rejected under 35 U.S.C. § 112, 1st paragraph. Claims 9-11 and 13 are

determined to be allowable if rewritten to overcome the rejection under 35 U.S.C. § 112, 1st paragraph, and to include all of the limitations of the base claims.

The Applicant has amended claims 1, 5 and 9. Additionally, the Applicant herewith submits remarks specifically responding to the rejections in the pending Office Action.

3. Response To Objections Of Claims 9-11 and 13

The Office Action states that claims 9-11 and 13 would be allowable if rewritten to overcome the rejection under 35 U.S.C. § 112, 1st paragraph, and to include all of the limitations of the base claim and any intervening claims. The Applicant has amended claim 9 to include all of the limitations of the base claim and any intervening claims. Further, Applicant submits that the 35 U.S.C. § 112, 1st paragraph, rejection has been traversed, as explained in detail below with respect to limitations of the base claims.

Thus, the Applicant submits that amended claim 9, and claims 10, 11 and 13 that depend from claim 9, are in condition for allowance.

4. Response To Rejections Of Claims.

a. Rejection Under 35 U.S.C. 112

In the Office Action the Examiner rejects Claims 1, 5, 14, and 15 under 35 U.S.C. 112, 1st paragraph, as failing to comply with the written description requirement. In particular the Examiner alleges that with regard to claims 1 and 5, the specification does not show:

(b) “setting said status entry for each of said tiles in said tile format table, wherein said status entry indicates the memory size of each of said tiles after compression, with full size indicating a non-compressed tile;” and

the element added to claim 1 by the previous amendment, specifically:

(f) “retrieving said tiles from said memory whereby said status entry indicating memory size is used to determine whether said tiles need to be decompressed at time of retrieval.”

The Examiner also alleges with regard to claims 14 and 15, that the specification does not show a “status entry further indicates the validity of data in said tile.”

Concerning what has become referred to as limitation (b) stated above, the Applicant has previously noted that support can be found at least on page 9, line 19 - page 10, line 2 (last paragraph of page 9). In particular, the specification states: “Correspondingly, the TFT contains a value 1 to 4 for each tile describing the number of words containing the compressed tile (1 to 3 words) or the uncompressed pixel tile (4 words if the tile cannot be compressed into fewer than 4 words).” Hence the number 1 to 4 is a “status entry” describing the “memory size of the tiles after compression” with a 4 indicating a “full size indicating a non-compressed-tile.” Furthermore, the Application previously pointed out that support can also be found on page 8, line 11-15, which states:

“To avoid these problems, the present invention includes a means of tracking the compression status of each tile via a Tile Format Table (TFT). The TFT includes an entry for each tile in the table. When the tile is written to memory, its corresponding TFT entry is updated to indicate whether it is compressed or not.”

The Office Action, nevertheless, alleges that these citations to the specification are insufficient because, allegedly, the specification shows the status entry of data

("words") and not the status entry of memory size. However, the Applicant has clearly pointed out, in the previous Amendment, and the above-recited portions of the specification, that the status entry does indicate the memory size by a measure of a number of words. In this regard, the Applicant further points out that it is well known to measure a memory size by the number of data words that can fit therein, and the number of data words and memory size are therefore interchangeable. For example, according to the often used on-line technology glossary, www.techweb.com/encyclopedia, a word is a computer's "internal storage unit" to measure an amount of data, based on the amount of data that can be held in the computer's internal general purpose data registers at one time, which is clearly a memory size measurement. Considering this point, the Examiner's attempt to discount the clear support of the status entry's indication of memory size in the specification (as a measure of data words) could be likened to alleging that temperature measured in Celsius can never be measured on the Fahrenheit scale.

Regarding what has become referred to as limitation (f) stated above, which was newly added in the last Amendment, the Examiner uses the same reasoning for rejecting limitation (f) as was used for rejecting limitation (b). Thus, the Applicant submits that the limitation (f) is supported in the specification for the same reason that limitation (b) is supported by the specification.

With regard to claims 14 and 15, the Applicant has previously pointed out the locations where the specification provides support for the element wherein the "status entry further indicates the validity of data in said tile." To reiterate, support can be found at least on page 10, line 4-13 (first paragraph of page 10). In particular line 7-8 states: "In one embodiment, the TFT contains an additional status indicator which can be used to

identify a tile as invalid.” There does not seem to be any ambiguity with the support for this element. The language of the claim almost tracks, word for word, with the specification. However, the Examiner provides absolutely no reasoning in the Office Action as to why this previously noted support is not acceptable. Thus, the Applicant reiterates that claims 14 and 15 are fully supported by the specification, at least at the above referred to sections of the specification.

As discussed above, the specification does provide support for all of the pending claims. As such, the Applicant asserts that rejection of these claims under 35 U.S.C. § 112, 1st paragraph, has been overcome. Further, the Applicant asserts that the separate Objection contained in the Office Action to claims 1 and 5 is overcome for the same reasons.

b. Rejection Under 35 U.S.C. 103(a)

The Examiner rejects claims 1-8 and 14-15 under 35 U.S.C. 103 as being unpatentable over the combination of *Bhargava* (U.S. Patent No. 5,471,248) and *Jung* (U.S. Patent No. 5,805,226). The Applicant has added back a previously deleted portion of independent claims 1 and 5, so that each of those claims contains an element of “defining a tile format table, separate from data storage of said tiles, containing a status entry for each of said plurality of tiles” (added-back portion underlined). The examiner had previously claimed that this element of having a table containing status entries that is separate from the data storage of the tiles was not supported under 35 U.S.C. § 112, first paragraph. However, the Applicant directs the Examiner to the following language from the specification:

“The compression status of each tile could be stored in the tile itself.. However, an uncompressed tile has no available space to indicate its status as an uncompressed tile. In addition, at least the first word of each tile would need to be read to determine if it is compressed or not, reducing memory efficiency, because reading the first word of a tile before making a decision about how many memory words to read would make typical pipelined memory access difficult. To avoid these problems, the present invention includes a means of tracking the compression status of each tile via a Tile Format Table (TFT). The TFT includes an entry for each tile in the table. When the tile is written to memory, its corresponding TFT entry is updated to indicate whether it is compressed or not.” (p. 8, ll. 2-14).

Thus, not only is the element of “defining a tile format table, separate from data storage of said tiles, containing a status entry for each of said plurality of tiles” clearly disclosed in the specification, the advantages of providing this element, and the disadvantages of not doing so, are discussed therein. Therefore, the Applicant submits that no new matter is added by the re-addition of this element into the claims.

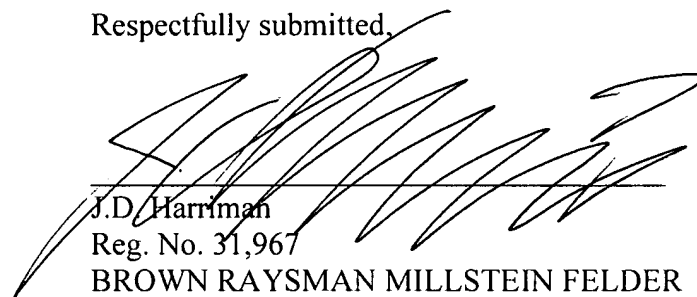
The applicant further submits that none of the prior art references cited by the Examiner disclose or suggest the element of “defining a tile format table, separate from the data storage of said tiles, containing a status entry for each of said plurality of tiles,” alone or in combination. In this regard, the rejection of independent claims 1 and 5 under 35 U.S.C. § 103 has been overcome. Claims 2-4, 6-8 and 14-15 each depend from either claim 1 or 5, and the rejection of claims 2-4, 6-8 and 14-15 has thus been overcome for the same reasons that the rejection of claims 1 and 5 have been overcome.

CONCLUSION

The Applicant has made an earnest and bona fide effort to clarify the issues before the Examiner and to place this case in condition for allowance. In view of the foregoing discussions, it is clear that the cited art, individually or in combination, does not teach all of the elements of any claim, as amended, of the present invention, and each claim is supported by the specification. Thus, the claimed invention is patentably distinct over the prior art. Therefore, reconsideration and allowance of claims 1-11 and 13-15 is believed to be in order, and an early Notice of Allowance to this effect is respectfully requested.

Respectfully submitted,

Dated: April 5, 2005



J.D. Harriman
Reg. No. 31,967
BROWN RAYSMAN MILLSTEIN FELDER
& STEINER LLP
1880 Century Park East, Suite 1200
Los Angeles, California 90067
(310) 712-8300

JDH:IP:Sk